Cessna
A Textron Company

December 3, 2008

Jack J. Pelton
Chairman, President & CEO

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: WT Docket No. 07-293
IB Docket No. 95-91
Gen. Docket No. 90-357
Room No. - 8610

Dear Chairman Martin:

Cessna Aircraft Company ("Cessna") writes to express its concerns regarding the subject of interference to sensitive flight test receiving stations from Wireless Communications Service (WCS") operations.

Since its inception in 1927, Cessna has delivered some 190,000 airplanes to nearly every country in the world. With 1,272 aircraft delivered in 2007, Cessna is the world's largest manufacturer of general aviation aircraft based on unit sales. Cessna's ability to efficiently develop, test, certify and manufacture new aircraft for domestic and foreign sales is a major factor in our success. If our flight testing abilities are diminished, Cessna's business will face significant hardship.

The Commission has invited comment regarding the protection of adjacent band services against "the risk of interference" from licensees of WCS spectrum. Flight test telemetry spectrum at 2360-2390 MHz is immediately adjacent to the 2345-2360 MHz WCS band. WCS licensees are seeking changes to the Commission Rules to accommodate mobile and portable devices employing wireless broadband technology. The WCS spectrum has been predominantly idle for more than 10 years, during which WCS use has been of a fixed nature. This proposed change presents a stark deviation from the use of the band by WCS as originally envisioned, and a new, elevated interference potential in the form of ubiquitous subscriber use.

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Maintaining the fidelity of spectrum used for flight test telemetry is extremely important for Cessna. Telemetry provides an essential link between the test aircraft and engineers on the ground. Via telemetry, engineers are able to monitor the condition and performance of the aircraft in real-time. In addition to increasing test efficiency, engineers use telemetry to detect dangerous conditions aboard the aircraft when there is still time to take corrective measures. Flight safety is dependent on telemetry spectrum that is free of interference.

Telemetry spectrum is also essential for our productivity. Using telemetry, we are able to validate test points during flight. This enables us to complete more test points during a single flight, reduces the number of flights required for a program, and expedites FAA and foreign certification processes. Telemetry enables us to complete our test programs using the most efficient methods available, reducing costs and enhancing Cessna's ability to compete globally.

Cessna supports efficient use of the spectrum and has no bias against alternatives for high speed internet access. We are opposed to the proposal by AT&T and other WCS licensees only because it does not include adequate protections, thereby posing a real and significant threat of interference to flight test telemetry operations. Unless there is a change in the Commission's Rules, interference from WCS operations will severely reduce the reliable telemetry range, and therefore, the useable air space for flight testing. Flight testing is subject to constraints that are beyond our control. Test flights must be performed when and where weather conditions are suitable, avoiding air traffic congestion, and are subject to FAA control. Adding a large reduction in range caused by spectrum interference to the existing constraints could make the band impractical to use for flight test telemetry operations.

Cessna supports the comments filed in this proceeding by its Association, the Aerospace and Flight Test Radio Coordinating Council ("AFTRCC"). AFTRCC engineering studies demonstrate the detrimental effects of allowing WCS companies to launch their new service using the current out-of-band emission limit. Our experts have advised that we can not filter out the WCS emissions that spill into the flight test band since that would also filter out our own signal. Therefore, protection must come from the WCS side in the form of tighter OOBE standards and the related rules as AFTRCC has proposed.

I hope you will consider our position as you finalize your decision and ensure that, in a desire to assist the launch of WCS spectrum after years of inactivity, nothing is done which increases interference risks, affecting the safety of our pilots and our productivity. Thank you.

Sincerely,

Jack J. Pelton
Chairman, President and CEO

cc: The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell

Charles Mathias
Angela Giancarlo
Renee Crittendon
Bruce Gottlieb
Julius P. Knapp
Ronald Repasi
Joel Taubenblatt
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